



**PLAINS  
COTTON  
GROWERS**

LEGISLATION. RESEARCH. PROMOTION. SERVICE.

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September 15, 2020

The Honorable Andrew Wheeler  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20004

Dear Administrator Wheeler:

The following comments are shared with you on behalf of the membership of Plains Cotton Growers, Inc. (PCG). Cotton producers in the High Plains region of Texas rely greatly on the weed control technologies incorporated into dicamba-tolerant cotton varieties. As in other cotton producing areas of the U.S., glyphosate-resistant Palmer Amaranth poses a specific and costly risk to cotton production in this area. We believe the use of dicamba-tolerant cotton varieties and the continued availability of new herbicide products specifically labelled for use with them is essential to our members and encourage you to work diligently with the product registrants to complete the reregistration process for the dicamba herbicide products Xtendimax, Engenia, and FeXapan.

The June 3, 2020 decision of the U.S. Ninth Circuit Court of Appeals to vacate the registrations of these newest dicamba formulations (Xtendimax, Engenia, and FeXapan) could have been a devastating blow to farmers who were already struggling with a multitude of challenges at the start of the 2020 production season. Fortunately, your agency was able to provide a workable solution allowing the utilization of existing stocks that were in the possession of farmers and their commercial applicators. Despite the ruling of the Ninth Circuit panel, we understand that the temporary registrations for these dicamba products were set to expire at the end of the 2020 production season and that your Agency had already been working with the registrants on the process of renewing the registrations for these products. As we approach the end of the 2020 production season, farmers around the country soon will be shifting their thoughts to 2021 and we strongly encourage your Agency to press ahead to complete this registration renewal process as quickly as possible and to provide for a longer term, durable registration that provides greater legal certainty to producers moving forward. Once the federal labels are finalized, individual states can begin making decisions on specific rules for the use of the products to best meet the unique needs of the producers in their states. The sooner a federal label is in place, the quicker our growers will know whether or not they can confidently order dicamba-tolerant seed and finalize their choice of dicamba herbicide to incorporate into their weed control plan.



SUPPORTER OF COTTON INCORPORATED

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As much as 70 percent of U.S. cotton acres (~8.5 million acres) are planted to dicamba-tolerant varieties and, coupled with the greatly improved stewardship of dicamba and the absence of notable drift incidents related to use in cotton, we encourage the Agency to avoid adding unnecessary dicamba label restrictions in the Cotton Belt. If additional label restrictions are considered, we would urge the Agency to apply those restrictions only to the crops and regions of the country where drift remains a problem.

PCG believes that cotton producers throughout the U.S. have demonstrated a strong commitment to meeting their compliance obligations and routinely take additional measures to minimize potential issues. The critical need for effective weed control in the face of glyphosate-resistant Palmer Amaranth will continue to incentivize farmers to take additional precautions rather than lose access to these critical weed management tools. PCG appreciates the thorough, science-based risk assessment process employed by EPA when considering a pesticide registration or registration review. We recognize the vast amount of scientific data that goes into informing the registration decisions you make and depend on the Agency to gather, evaluate and maintain the science-based foundation for the registration and use of critical pesticide products.

Thank you for the opportunity to provide comments supporting the continued registration of the dicamba products Xtendimax, Engenia, and FeXapan and we look forward to an announcement in this regard in the very near future.

Respectfully,  


Steve Verett  
Chief Executive Officer